Q&A

When does a label on product to be exported need to be approved as a sketch by Labeling, Product & Technology Standards Division, Label Review Branch (**LRB**) in Washington?

The FSIS Export Library must be consulted to determine if a country has special requirements. Additionally, changes may be desired in ingredients, product names, etc. which cause the label to deviate from permitted domestic requirements (See E below).   The following are possible export labeling situations and their approval requirements:

	Label Attributes	Approval Required	Regulatory Authority
A	1. English only 2. Meets FSIS requirements	**SAME APPROVAL AS FOR DOMESTIC USE**; generic approval allowed if allowed domestically	Meat - 9 CFR 317.4 or 9 CFR 317.5 Poultry - 9 CFR 381.132 or 9 CFR 381.133
B	1. Bilingual[1] 2. Meets FSIS Requirements 3. Containers **NOT** marked "For Export Only" (implies possible usage for domestic or export)	**LRB Sketch Approval** required	Meat - 9 CFR 317.4 or 9 CFR 317.5 Poultry - 9 CFR 381.132 or 9 CFR 381.133
C	1. Bilingual[1] 2. Meets FSIS requirements 3. Containers marked "For Export Only"	**GENERIC APPROVAL** allowed for addition or deletion of direct translation of foreign language on English label which qualifies for generic approval or which has already been sketch approved by LRB	Meat - 9 CFR 317.4 or 9 CFR 317.5 Poultry - 9 CFR 381.132 or 9 CFR 381.133

D	1. English or bilingual[1]
	 2. Containers marked "For Export Only"
	 3. Meets FSIS requirements
	 4. Accompanied by foreign language "sticker" with special labeling information required by the country
		1. Labeling
		   a. If English only , see A
		   b. English and foreign language - see C
		
		 2. "Sticker" - allowed without LRB approval if **Letter of Guarantee** provided by exporter
			1. Meat 9 CFR 317.4 or 9 CFR 317.5 Poultry - 9 CFR 381.132 or 9 CFR 381.133
			
			 2. Letter of guarantee required by FSIS Directive 9000.1 for foreign language "Stickers"

E	1. English or bilingual[1] 2. Containers marked "For Export Only" 3. Does not meet FSIS requirements	1. **LRB Sketch approval** required 2. Requires support documentation verifying foreign government acceptance of the labeling deviation.	1. Meat - 9 CFR 317.4 or 9 CFR 317.5 Poultry - 9 CFR 381.132 or 9 CFR 381.133 2. 9 CFR 317.7 / 381.128
F	1. Foreign language only (must have Est. Number and Inspection Legend in English) 2. Marked "For Export Only" 3. May or may not meet FSIS requirements (translated)	1. **LRB Sketch approval** required 2. If does not meet FSIS requirements see E above.	Meat - 9 CFR 317.4 Poultry - 9 CFR 381.132

[1] Bilingual can mean contiguous insertion of the foreign language or a separate foreign language label.